



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

) Criminal No. 1:23-CR-259(GJS)

V.

RYLAN PETERSON, ORYIN
MCLEOD, and KENNETH
MITCHELL LOCKE

3) Indictment

Defendants.

-) Violations: 18 U.S.C. § 371 [Conspiracy to Commit an Offense Against the United States];
-) 18 U.S.C. § 932(b)(2) [Conspiracy to Straw Purchase Firearms]; and
-) 18 U.S.C. § 922(a)(5) [Unlawful Transfer of Firearms to an Out-of-State Resident]
-)
-) Three Counts
-)
-) County of Offense: Ulster

THE GRAND JURY CHARGES:

COUNT 1

[Conspiracy to Commit an Offense Against the United States]

Between on or about December 5, 2022, and on or about January 24, 2023, in Ulster County in the Northern District of New York, and elsewhere, the defendants, **RYLAN PETERSON, ORYIN MCLEOD, KENNETH MITCHELL LOCKE**, and others known and unknown, knowingly and willfully conspired and agreed with each other to commit an offense against the United States, to wit, violations of Title 18, United States Code, Section 922(a)(6).

Objects of the Conspiracy

It was a part and an object of the conspiracy that the defendants, **RYLAN PETERSON**, **ORYIN MCLEOD**, **KENNETH MITCHELL LOCKE**, and others known and unknown, in connection with the acquisition and attempted acquisition of firearms from a licensed importer, licensed manufacturer, licensed dealer, and licensed collector, would and did knowingly make false and fictitious oral and written statements intended and likely to deceive such importer, manufacturer, dealer, and collector, with respect to facts material to the lawfulness of the sale and disposition of such firearms, in violation of Title 18, United States Code, Section 922(a)(6).

Overt Acts

In furtherance of the conspiracy and to affect the object of the conspiracy, the following overt acts, among others, were committed in the Northern District of New York and elsewhere:

On or about December 8, 2022, **ORYIN MCLEOD**, residing in New York, provided **RYLAN PETERSON**, residing in North Carolina, with a list containing firearms to be obtained by **RYLAN PETERSON** in North Carolina on behalf of **ORYIN MCLEOD** and others known and unknown.

On or about December 9, 2022, **ORYIN MCLEOD** provided payment to **RYLAN PETERSON** for the firearms to be purchased.

On or about December 10, 2022, **RYLAN PETERSON** paid **KENNETH MITCHELL LOCKE** to purchase the firearms.

On or about December 10, 2022, **KENNETH MITCHELL LOCKE** purchased the firearms through a Federal Firearms Licensee located in North Carolina and, which were received by **KENNETH MITCHELL LOCKE** in North Carolina.

In or about December 2022, **RYLAN PETERSON**, transported firearms from North Carolina to New York where he provided them to **ORYIN MCLEOD**, and others known and unknown.

All in violation of Title 18, United States Code, Section 371.

COUNT 2
[Conspiracy to Straw Purchase Firearms]

Between on or about December 5, 2022, and on or about January 24, 2023, in Ulster County in the Northern District of New York, and elsewhere, the defendant, **RYLAN PETERSON**, did knowingly conspire with others known and unknown to purchase firearms, to wit: a Glock 42 .380 caliber semi-automatic pistol bearing serial number AGNB467 and an Armscor 206 .38 special revolver bearing serial number RIA2575074, in or otherwise affecting interstate or foreign commerce for, on behalf of, or at the request or demand of **ORYIN MCLEOD**, knowing or having reasonable cause to believe that **ORYIN MCLEOD** intended to use, carry, possess or sell or otherwise dispose of the firearm in furtherance of a felony, in violation of Title 18, United States Code, Section 932(b)(2).

COUNT 3
[Unlawful Transfer of Firearms to an Out-of-State Resident]

In or about December 2022, in Ulster County in the Northern District of New York, and elsewhere, the defendant, **RYLAN PETERSON**, not being a licensed importer, licensed manufacturer, licensed dealer, and licensed collector of firearms, willfully transferred, sold, gave, transported, and delivered one or more firearms, to wit, a Glock 42 .380 caliber semi-automatic pistol bearing serial number AGNB467 and an Armscor 206 .38 special revolver bearing serial number RIA2575074, to a person(s) other than a licensed importer, licensed manufacturer, licensed dealer, and licensed collector of firearms who the defendant knew and had reasonable

cause to believe did not reside in the state in which the defendant resided, in violation of Title 18, United States Code, Sections 922(a)(5) and 924(a)(1)(D).

Dated: June 29, 2023

A TRUE BILL,

Grand Jury Foreperson
***Redacted Foreperson Name

CARLA B. FREEDMAN
United States Attorney

By:

Dustin C. Segovia
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